

Department of the Interior
Privacy Impact Assessment

November 6, 2012

Name of Project: Interior Valuation Information System (IVIS)

Bureau: Office of the Secretary, Office of Valuation Services

Project's Unique ID: 010-000000699

Once the PIA is completed and the signature approval page is signed, please provide copies of the PIA to the following:

- Bureau/office IT Security Manager
- Bureau/office Privacy Act Officer
- DOI OCIO IT Portfolio Division
- DOI Privacy Act Officer

Do not email the approved PIA directly to the Office of Management and Budget email address identified on the Exhibit 300 form. One transmission will be sent by the OCIO Portfolio Management Division.

A. CONTACT INFORMATION:

Departmental Privacy Office
Office of the Chief Information Officer
U.S. Department of the Interior
202-208-1605
DOI_Privacy@ios.doi.gov

B. SYSTEM APPLICATION/GENERAL INFORMATION:

1) Does this system contain any information about individuals?

Yes. The system contains information about businesses that provide property appraisal or valuation services. In some cases, these businesses are sole proprietors who operate under their own names. The information in the system concerning these sole proprietors could include name, business address, business mailing address, business telephone numbers, and business email address.

The system also contains information about private property owners. In instances where the property owners are individuals, the personal information in the system could include name, physical address, mailing address, tax map and lot numbers, and information on public documents, such as book and page numbers for deeds and other recorded documents. Private property owners' contact information is provided by the bureau requesting the valuation. The inclusion of this information is necessary because the Uniform Appraisal Standards for Federal Land Acquisitions require that property owners or a designated representative be given the opportunity to accompany the appraiser on the property inspection.

a. Is this information identifiable to the individual¹?

(If there is **NO** information collected, maintained, or used that is identifiable to the individual in the system, the remainder of the Privacy Impact Assessment does not have to be completed).

The information provided in the system relates to real or mineral property estates to be valued. In most cases, the property is government owned; however, some of the property is privately owned, and some of the private owners are individuals.

There is some information that is personally identifiable to individuals; however the information is not sensitive personal information and is largely available through public sources. In the case of appraisers, only business contact

¹ "Identifiable Form" - According to the OMB Memo M-03-22, this means information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors).

information that is generally available through a wide variety of public sources is collected. For individual private property owners, the information obtained is publicly available through municipal tax records and public land recordings held by municipal clerks, registry of deeds, or courts.

b. Is the information about individual members of the public?

(If YES, a PIA must be submitted with the OMB Exhibit 300, and with the IT Security C&A documentation).

The information about appraisers is business contact information and therefore is not information about the public. Information about private landowners is about members of the public. However, this information is publicly available through municipal tax records and public land recordings held by municipal clerks, registry of deeds, or courts.

c. Is the information about employees? (If yes and there is no information about members of the public, the PIA is required for the DOI IT Security C&A process, but is not required to be submitted with the OMB Exhibit 300 documentation).

The system does not contain information about employees of the Department of the interior or its agencies or bureaus.

2) What is the purpose of the system/application?

IVIS is a web-based, client accessible application for requesting valuation services from DOI's Office of Valuation Services (OVS). The system can be used by DOI bureaus and agencies to obtain valuations for real property, analysis of market rents, and evaluations of mineral rights including market analysis of economic conditions and pricing for minerals.

IVIS provides a mechanism for managing workflow and approvals for all types of valuation cases in the system. IVIS also generates automatic notifications and facilitates communications among the various parties using the system. In addition, clients submitting requests are provided with online worksheets and checklists to aid in gathering essential data.

3) What legal authority authorizes the purchase or development of this system/application?

Office of Management and Budget Circular A-127, Policies and Standards for Financial Management Systems; The Economy Act, 31 U.S.C. 1535; the Paperwork Reduction Act, 44 U.S.C. 3501; Federal Agency Responsibilities, 44

U.S.C. 3506; the Clinger-Cohen Act of 1996, 40 U.S.C. 1401; OMB Circular A-130; 44 U.S.C. 101, E-Government Act of 2002; 44 U.S.C. 3541 Federal Information Security Act

C. DATA in the SYSTEM:

1) What categories of individuals are covered in the system?

The system contains information about two categories of individuals. This includes property appraisal businesses operated as sole proprietorships and operating under the sole proprietor's name. The system also contains information about private property owners.

2) What are the sources of the information in the system?

a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?

Information about contract appraisers is obtained from the National Registry's Appraisal Subcommittee directory or directly from the contract appraiser when bidding on an assignment.

Information about private property owners is obtained from the individuals or their designated representative by the bureau requesting the property valuation and submitted to OVS.

b. What Federal agencies are providing data for use in the system?

All information pertaining to private property owners is put into the system by officials from four DOI Bureaus (the Bureau of Land Management, the Bureau of Reclamation, the Bureau of Fish and Wildlife, and the National Park Service) when requesting property valuations. No data is being provided by Federal agencies outside of DOI.

c. What Tribal, State and local agencies are providing data for use in the system?

In certain cases, publicly available tax records and recorded real estate documents may be obtained from certain municipalities and local agencies. The data is public information but is entered into the system by DOI employees. Otherwise, no Tribal, State or local agencies are providing data for use in the system.

d. From what other third party sources will data be collected?

Data will not be collected from any other third party sources.

e. What information will be collected from the employee and the public?

Information will not be collected from DOI employees. Information collected from the public will be limited to the information collected from private property owners and appraisal and valuation businesses, as described above.

3) Accuracy, Timeliness, and Reliability

a. How will data collected from sources other than DOI records be verified for accuracy?

Information provided by individuals, such as contact information for valuation service businesses, may be verified by system administrators or OVS employees if there appears to be a discrepancy. The information entered into the system concerning contract appraisers typically comes directly from the appraiser or is entered by a DOI employee with data from an executed contract for services. In either case, the appraiser is responsible for providing accurate information.

Information about private property owners is obtained from the Bureau requesting a property valuation and is verified by the property owner. If the property owner cannot be contacted, the information may be verified by system administrators or OVS employees.

Data accuracy is further ensured by limiting access to the system. Contract appraisers and private property owners do not have access to the system. OVS employees can update contract appraiser profile information as needed. Beyond these updates, only the Site Administrator and the System Administrator can modify data in the system.

b. How will data be checked for completeness?

When a valuation request is entered into IVIS, there are automated validation mechanisms to ensure that required information fields are completed. Certain data fields are subject to additional validation to ensure that the proper type of data is entered.

c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).

Appraisal requests are completed within a short timeframe (usually within a matter of weeks). Therefore, the data for both contract appraisers and property owners is current.

d. Are the data elements described in detail and documented? If yes, what is the name of the document?

Data elements will be described in the Certification and Accreditation package for IVIS. Other resources that describe the data fields are:

- User Guide, and
- Frequently Asked Questions (FAQ).

Both are located in the “Help” section of IVIS and are available to all registered users.

D. ATTRIBUTES OF THE DATA:

1) Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

IVIS contains personal information of two types: Information about contract appraisers and private property owners. Contract appraiser information is used to ensure the correct contract appraiser is selected during the valuation routing process using criteria such as licensing, location and areas of valuation expertise. Private property owner information is necessary in order to complete various transactions with those owners, such as the purchase of land, mineral, or easement rights. In addition, as mentioned previously, it is a requirement of the Uniform Appraisal Standards for Federal Land Acquisitions that property owners or a designated representative is given the opportunity to accompany the appraiser on the property inspection.

2) Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?

The system will not derive new data or create previously unavailable data.

3) Will the new data be placed in the individual’s record?

Not applicable - the system will not derive new data or create previously unavailable data.

- 4) Can the system make determinations about employees/public that would not be possible without the new data?**

Not applicable - the system will not derive new data or create previously unavailable data.

- 5) How will the new data be verified for relevance and accuracy?**

Not applicable - the system will not derive new data or create previously unavailable data.

- 6) If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**

The data is not being consolidated.

- 7) If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.**

Not applicable - no processes are being consolidated.

- 8) How will the data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.**

Information about appraisers and valuation professionals may be retrieved in any of the following ways:

1. Keyword Search of the directory of registered businesses
2. Browsing the full member directory.
3. Browsing the member directory using filter criteria such as business location or work category.

The searches listed above are available only to OVS employees.

Information concerning specific properties can be obtained using keyword searches.

- 9) What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

IVIS does not produce reports on individuals.

10) What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent.)

For private landowners, entering the valuation process and engaging in a property transaction is a voluntary process. Property owners have the right to decline to participate in the process and not provide personal information.

However, for landowners who enter the valuation process, the information is required by the bureau requesting the valuation, as the Uniform Appraisal Standards for Federal Land Acquisitions require that property owners or a designated representative be given the opportunity to accompany the appraiser on the property inspection.

For contract appraisers, performing valuations is a voluntary process. However, for appraisers who wish to perform valuations for OVS, it is necessary to have business contact information included in the system.

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:

1) If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?

The data will be held of a FISMA compliant cloud server by a third party vendor located in the United States, and will not be held at more than one site.

2) What are the retention periods of data in this system?

Retention periods vary as records are maintained in accordance with the applicable records schedule for each specific type of record. Pursuant to Office of the Secretary (OS) records schedule 7569 (IVIS, N1-048-10-01), the disposition for appraisal request and review files in the system is Temporary, with cut-off at the final updating of the record. Records are archived to inactive storage media 25 years after cut-off and destroyed 75 years after cut-off. Website files are retained in accordance with OS records schedule 1217. Under schedule 1217, cut-off occurs when the data is superseded and the data is destroyed when no longer needed for agency business.

3) What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?

Records are disposed of in accordance with NARA guidelines and DOI records management policies. Disposition of paper records includes shredding, burning and tearing, and electronic records are degaussed in accordance with 384 DM 1.

4) Is the system using technologies in ways that the DOI has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?

No, the system does not use new technologies in ways that DOI has not previously employed.

5) How does the use of this technology affect public/employee privacy?

Not applicable - the system does not use new technologies in ways that DOI has not previously employed.

6) Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.

No, the system does not provide the capability to identify, locate, and monitor individuals.

7) What kinds of information are collected as a function of the monitoring of individuals?

Not applicable - the system does not provide the capability to identify, locate, and monitor individuals.

8) What controls will be used to prevent unauthorized monitoring?

Not applicable - the system does not provide the capability to identify, locate, and monitor individuals.

9) Under which Privacy Act systems of records notice does the system operate? Provide number and name.

Not applicable. IVIS is not intended to create a Privacy Act system of records. IVIS is used to provide valuation assignments to appraisal and valuation businesses and to identify properties that for which valuation services are being performed. Information in the system will not be retrieved using personal identifiers.

10) If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.

Not applicable – the system is not being modified.

F. ACCESS TO DATA:

1) Who will have access to the data in the system? (E.g., contractors, users, managers, system administrators, developers, tribes, other)

System administrators, and DOI agencies that use IVIS to identify and request work be completed by OVS will have access to the system.

2) How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?

Access controls are utilized which require users to register in order to view and post data in the system. Only employees of DOI bureaus and agencies who use IVIS in performing their job duties will be given user level access.

3) Will users have access to all data on the system or will the user's access be restricted? Explain.

Access controls are utilized which require users to register in order to view and post data in the system. Access is granted on a need to know basis. For example, only employees of DOI bureaus and agencies who use IVIS in performing their job duties will be given user level access. Bureau officials who use IVIS will have access only to valuations cases submitted by their bureau. OVS employees are assigned to specific teams that service specific bureaus. Each team can only view the information pertaining to cases for the bureaus serviced by their team.

4) What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access? (Please list processes and training materials)

Access controls are utilized which require user registration prior to viewing data in the system. Each user has a unique username (the user's email address) and password that is required to access the website. The data is stored in a secure database that requires a unique domain/username/password configuration to access. This login information is restricted to the developers of the website. Only system administrators will have this information.

- 5) Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?**

The (OVS) contracted with the National Business Center (NBC) to design the IVIS system. NBC contracted with an outside vendor to build and maintain the system. OVS's contract with NBC contained Privacy Act contract clauses and addressed relevant regulatory measures; NBC's contracts with the contractors contained the same Privacy Act contract clauses and also addressed relevant regulatory measures.

- 6) Do other systems share data or have access to the data in the system? If yes, explain.**

IVIS is a standalone application that does not share data with any other systems.

- 7) Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

The System Administrator and System Manager will have responsibility for ensuring privacy protections.

- 8) Will other agencies share data or have access to the data in this system (Federal, State, Local, Other (e.g., Tribal))?**

Access to data is restricted to registered users and is further restricted to only allow access to data that is specific to the registered user's bureau. Only Federal agencies that contract to use IVIS will be able to register as users.

- 9) How will the data be used by the other agency?**

Data in the system is used to complete necessary transactions that help to promote and maintain the continued missions of each federal agency.

- 10) Who is responsible for assuring proper use of the data?**

The System Administrator, System Manager, and system developers are responsible for maintaining the system. The System Administrator will be able to review and monitor data and usage of the system. The System Administrator can also restrict or terminate access if a user violates the site's Terms of Use.